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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA, SOUTHERN DIVISION**

YUICHI MIYAYAMA, an individual,

Plaintiff,

v.

STEVEN H. BURKE, as Executor of the Estate of
NORIKO HOSODA, *et al.*,

Defendants.

Case No. 2:20-cv-01683-DJA

**STIPULATION AND ~~PROPOSED~~
ORDER FOR EXTENTION OF TIME
TO RESPOND TO THE BURKE
DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT.**

IT IS HEREBY STIPULATED, by and between the parties and through their counsel of record, that Plaintiff Yuichi Miyayama ("Mr. Miyayama") shall have an extension of ten additional days to respond to the pending Motion for Summary Judgment (the "Motion," ECF No. 150) filed by Defendants Steven H. Burke, Individually and as Executor of the Estate of Noriko Hosoda, and The Law Office of Steven H. Burke, LLC (collectively, the "Burke Defendants") – from November 10, 2023, to **November 20, 2023**. As a corollary matter, the Burke Defendants shall then have until **December 8, 2023**, within which to file a Reply in support of the Motion.

These extentions are necessary because Mr. Miyayama is currently scheduled to respond to two substantial dispositive motions in one week, within days of each other: November 8, and 10, 2023. Counsel for Mr. Miyayama also has long-planned family obligations over this time. This combination presents an undue burden on counsel for Mr. Miyayama that a short extension

1 can alleviate, at no substantial detriment to any other deadline in the case management schedule
2 in this matter. Counsel for the Burke Defendants will likewise benefit from this short extension,
3 as their Reply deadline will no longer fall during the Thanksgiving holiday week. Other than
4 these two, very short, extensions of time to act, no other deadline will be affected by this
5 stipulation and order.

6 The parties further stipulate that the Court's Scheduling Order shall be modified
7 accordingly.

8 Respectfully submitted,

9 Dated: November 6, 2023

Dated: November 6, 2023

10 CHRISTIANSEN LAW, PLLC

LIPSON NEILSON P.C.

11 /s/ Anthony W. Stirling, Esq.

/s/ Janeen V. Isaacson

12 Stephen K. Christiansen, Esq. #11081

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Attorneys for Burke Defendants

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[E-signature used with permission]

15 Dated: November 6, 2023

16 LAW OFFICES OF MONT E. TANNER

17 /s/ Monte E. Tanner

18 Mont E. Tanner, Esq. #4433

19 2950 East Flamingo Road, Suite G

Las Vegas, Nevada 89121

20 *Attorney for Defendant Mont Tanner*

21 *[E-signature used with permission]*

22
23
24 IT IS SO ORDERED:

25 
26 UNITED STATES MAGISTRATE JUDGE

27 DATED: 11/7/2023